

IN THE UNITED STATES DISTRICT COURT
OF THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED-ED4

02 APR -5 PM 3:01

CLERK
U.S. DISTRICT COURT

SHAWN BROSSEAU,

Plaintiff,

v.

TRUMP CASINO CORPORATION and
HORNBLLOWER MARINE SERVICES,
INC.,

Defendants.

No.

TRIAL BY JURY DEMANDED

020 2474

DOCKETED

APR - 8 2002

JUDGE GOTTSCHELL

MAGISTRATE JUDGE MASON

COMPLAINT AT LAW

NOW COMES the Plaintiff, SHAWN BROSSEAU, by and through his attorneys, RICHARD A. HAYDU and HOEY, FARINA & DOWNES, and for his Complaint against the Defendants, TRUMP CASINO CORPORATION and HORNBLLOWER MARINE SERVICES, INC., states as follows:

COUNT I

JONES ACT V. HORNBLLOWER MARINE

1. That jurisdiction of this Court is based on 28 U.S.C. §1331 and 28 U.S.C. §1333.
2. That this action arises under and the rights and liabilities of the parties to this cause are governed by the Merchant Marine Act, commonly known as the Jones Act, 46 U.S.C. §688.
3. That on February 10, 2000, and at all times material hereto, Defendant, HORNBLLOWER MARINE SERVICES, INC., operated, maintained, controlled and provisioned a vessel, in operation on navigable waters of the United States in the State of Illinois, known as the TRUMP CASINO.

1-1

4. That on February 10, 2000, and at all times material hereto, Plaintiff, SHAWN BROSSEAU, was employed as a seaman and member of the crew by Defendant, HORNBLOWER MARINE SERVICES, INC., working aboard said vessel in navigation.

5. That on February 10, 2000, and at all times material hereto, the aforementioned vessel was located on Lake Michigan.

6. That on February 10, 2000, and at all times material hereto, Plaintiff, SHAWN BROSSEAU, sustained severe injuries to his body when he was caused to lift a heavy and cumbersome railing in the performance of his duties aboard the vessel known as the TRUMP CASINO.

7. That the said accident and resulting injury and disability was due to the negligence, carelessness, want of due care, and recklessness, of Defendant, HORNBLOWER MARINE SERVICES, INC., its agents and employees, in its operation of said vessel and adjoining structures and its unsafe condition and/or unseaworthiness by virtue of the following:

- (a) Requiring Plaintiff to lift a heavy and cumbersome railing when mechanical alternatives were or should have been available;
- (b) Allowing such a structure to exist unnecessarily;
- (c) Allowing such a structure to exist when other alternatives to it were available;
- (d) Failing to properly supervise the work being done;
- (e) Failing to properly adopt safe methods for doing such work;
- (f) Failing to instruct its employees on the safe method for doing such work;
- (g) Failing to properly coordinate the lifting being done;
- (h) Failing to provide a safe place to work; and

- (i) Failing to provide sufficient and proper equipment.

8. That as a consequence, Plaintiff, SHAWN BROSSEAU, incurred injuries which have caused and will continue to cause him great pain, suffering, inconvenience, anguish and disability; as a further result, Plaintiff, has been and will in the future be kept from attending to his ordinary affairs and duties, and has lost and will lose great gains which he otherwise would have made and acquired; as a further result, Plaintiff has incurred medical, hospital and related expenses and is reasonably certain to incur further medical, hospital and related expenses in the future.

9. Plaintiff demands trial by jury.

WHEREFORE, Plaintiff, SHAWN BROSSEAU, demands judgment in his favor and against Defendant, TRUMP CASINO CORPORATION, in a sum of \$4,000,000.00, plus the costs of this suit.

COUNT II
JONES ACT V. TRUMP CASINO CORPORATION

1. That jurisdiction of this Court is based on 28 U.S.C. §1331 and 28 U.S.C. §1333.

2. That this action arises under and the rights and liabilities of the parties to this cause are governed by the Merchant Marine Act, commonly known as the Jones Act, 46 U.S.C. §688.

3. That on February 10, 2000, and at all times material hereto, Defendant, TRUMP CASINO CORPORATION, owned, operated, maintained, controlled and provisioned a vessel, in operation on navigable waters of the United States in the State of Illinois, known as the TRUMP CASINO.

4. That on February 10, 2000, and at all times material hereto, Plaintiff, SHAWN BROSSEAU, was working aboard the vessel TRUMP CASINO as an employee of Defendant, TRUMP CASINO CORPORATION.

5. That at said time and place, Plaintiff was either a borrowed servant or dual servant of HORNBLOWER MARINE SERVICES, INC. and TRUMP CASINO CORPORATION by virtue of the relation between HORNBLOWER MARINE SERVICES, INC. and TRUMP CASINO CORPORATION and the right of TRUMP to exert control over the crew affecting their working terms and conditions.

6. That on February 10, 2000, and at all times material hereto, the aforementioned vessel was located on Lake Michigan.

7. That on February 10, 2000, and at all times material hereto, Plaintiff, SHAWN BROSSEAU, sustained severe injuries to his body when he was caused to lift a heavy and cumbersome railing in the performance of his duties aboard the vessel known as the TRUMP CASINO.

8. That the said accident and resulting injury and disability was due to the negligence, carelessness, want of due care, and recklessness, of Defendant, TRUMP CASINO CORPORATION, its agents and employees, in its operation of said vessel and adjoining structures and its unsafe condition and/or unseaworthiness by virtue of the following:

- (a) Requiring Plaintiff to lift a heavy and cumbersome railing when mechanical alternatives were or should have been available;
- (b) Allowing such a structure to exist unnecessarily;
- (c) Allowing such a structure to exist when other alternatives to it were available;

- (d) Failing to properly supervise the work being done;
- (e) Failing to properly adopt safe methods for doing such work;
- (f) Failing to instruct its employees on the safe method for doing such work;
- (g) Failing to properly coordinate the lifting being done;
- (h) Failing to provide a safe place to work; and
- (i) Failing to provide sufficient and proper equipment.

9. That as a consequence, Plaintiff, SHAWN BROSSEAU, incurred injuries which have caused and will continue to cause him great pain, suffering, inconvenience, anguish and disability; as a further result, Plaintiff, has been and will in the future be kept from attending to his ordinary affairs and duties, and has lost and will lose great gains which he otherwise would have made and acquired; as a further result, Plaintiff has incurred medical, hospital and related expenses and is reasonably certain to incur further medical, hospital and related expenses in the future.

10. Plaintiff demands trial by jury.

WHEREFORE, Plaintiff, SHAWN BROSSEAU, demands judgment in his favor and against Defendant, TRUMP CASINO CORPORATION, in a sum of \$4,000,000.00, plus the costs of this suit.

COUNT III
GENERAL MARITIME LAW V. HORNBLOWER MARINE SERVICES

1-7. Plaintiff repeats and realleges paragraphs 1 through 6 of Count I as paragraphs 1 through 6 of Count III as if fully set forth herein.

8. That pursuant to the general maritime law, Defendant HORNBLOWER MARINE SERVICES, INC., as operator, maintainer, provisioner and/or owner pro hac vice of the aforementioned vessel owed Plaintiff, SHAWN BROSSEAU, a warranty of seaworthiness and had a duty to provide Plaintiff with a seaworthy vessel, a safe place with which to work, with safe gear appurtenances, and equipment and with a competent crew.

9. Disregarding this duty in the premises, Defendant, by its agents, servants, workmen and employees, caused or allowed the vessel known as the TRUMP CASINO to exist in an unsafe and unseaworthy condition in the manner in which its IBC devices were cordoned off and the resulting requirement of the crew to frequently remove the railing by hand.

10. The failure of Defendant, HORNBLOWER MARINE SERVICES, INC., to provide Plaintiff with a seaworthy vessel in a safe condition and to provide Plaintiff with a safe place to work was a cause of Plaintiff's injury and resulting disability.

WHEREFORE, Plaintiff, SHAWN BROSSEAU, demands judgment in his favor and against Defendant, HORNBLOWER MARINE SERVICES, INC. in the sum of \$4,000,000.00, plus the costs of this suit.

**COUNT IV
GENERAL MARITIME LAW V. TRUMP CASINO**

1-8. Plaintiff repeats and realleges paragraphs 1 through 6 of Count I as paragraphs 1 through 6 of Count III as if fully set forth herein.

9. That pursuant to the general maritime law, Defendant TRUMP CASINO CORPORATION, as operator, maintainer, provisioner and/or owner pro hac vice of the aforementioned vessel owed Plaintiff, SHAWN BROSSEAU, a warranty of seaworthiness and

had a duty to provide Plaintiff with a seaworthy vessel, a safe place with which to work, with safe gear appurtenances, and equipment and with a competent crew.

10. Disregarding this duty in the premises, Defendant, by its agents, servants, workmen and employees, caused or allowed the vessel known as the TRUMP CASINO to exist in an unsafe and unseaworthy condition in the manner in which its IBC devices were cordoned off and the resulting requirement of the crew to frequently remove the railings by hand.

11. The failure of Defendant, TRUMP CASINO CORPORATION, to provide Plaintiff with a seaworthy vessel in a safe condition and to provide Plaintiff with a safe place to work was a cause of Plaintiff's injury and resulting disability.

WHEREFORE, Plaintiff, SHAWN BROSSEAU, demands judgment in his favor and against Defendant, TRUMP CASINO CORPORATION, in the sum of \$4,000,000.00, plus the costs of this suit.

COUNT V
MAINTENANCE AND CURE V. HORNBLOWER MARINE SERVICES

1. That Plaintiff, SHAWN BROSSEAU, realleges and incorporates herein by reference paragraphs 1 through 9 in Count I.

10. That upon Plaintiff, SHAWN BROSSEAU, becoming injured and disabled as aforementioned, Defendant, HORNBLOWER MARINE SERVICES, INC., was obligated to furnish Plaintiff, SHAWN BROSSEAU, his maintenance and cure during the period of disability and to include a reasonable sum for said maintenance and cure.

11. Defendant has failed to fully pay Plaintiff's medical expenses to date, leaving approximately \$30,000.00 in outstanding bills with treatment continuing.

12. That refusal of Defendant, HORNBLOWER MARINE SERVICES, INC., to pay Plaintiff, SHAWN BROSSEAU, maintenance and cure in a prompt and satisfactory amount is arbitrary and capricious and Plaintiff, SHAWN BROSSEAU, is entitled to recover attorney fees and the sum of unpaid medical expenses to date.

**COUNT VI
MAINTENANCE AND CURE V. TRUMP CASINO CORPORATION**

1. That Plaintiff, SHAWN BROSSEAU, realleges and incorporates herein by reference paragraphs 1 through 9 in Count I.

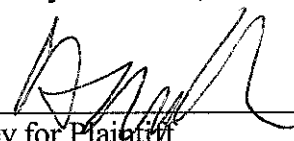
10. That upon Plaintiff, SHAWN BROSSEAU, becoming injured and disabled as aforementioned, Defendant, TRUMP CASINO CORPORATION, was obligated to furnish Plaintiff, SHAWN BROSSEAU, his maintenance and cure during the period of disability and to include a reasonable sum for said maintenance and cure.

11. Defendant has failed to fully pay Plaintiff's medical expenses to date, leaving approximately \$30,000.00 in outstanding bills with treatment continuing.

12. That refusal of Defendant, TRUMP CASINO CORPORATION, to pay Plaintiff, SHAWN BROSSEAU, maintenance and cure in a prompt and satisfactory amount is arbitrary and capricious and Plaintiff, SHAWN BROSSEAU, is entitled to recover attorney fees and the sum of unpaid medical expenses to date.

Richard A. Haydu
HOEY, FARINA & DOWNES
542 S. Dearborn Street
Suite 200
Chicago, IL 60605
(312) 939-1212

Respectfully submitted,



Attorney for Plaintiff

JS 44
(Rev. 12/96)

CIVIL COVER SHEET

2

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM)

I (a) PLAINTIFFS

SHAWN BROSSAU

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

Hoey, Farina & Downes
542 S. Dearborn, Suite 200
Chicago, IL 60605
312/939-1212

DOCKETED
APR - 8 2002

DEFENDANTS

TRUMP CASINO CORPORATION and
HORNBLOWER MARINE SERVICES, INC.

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT
(IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
TRACT OF LAND INVOLVED

ATTORNEYS (IF KNOWN)

02C 2474
JUDGE GOTTSCHALL
MAGISTRATE JUDGE MARSH

FILED-EDA
2 APR - 5 PM 3:06
U.S. DISTRICT COURT

II. BASIS OF JURISDICTION (PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 U.S. Government Plaintiff
☒ 2 U.S. Government Defendant
☒ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- | | | | | | |
|---|---------------------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from another district (specify)
☐ 6 Multidistrict Litigation
☐ 7 Appeal to District Judge from Magistrate Judgment

V. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input checked="" type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC §81 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customs Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence HABEAS CORPUS: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

Action for damages for personal injuries under Jones Act 46 USC §688 by seaman employee against employer

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION
☐ UNDER F.R.C.P. 23

DEMAND \$
\$4,000,000

Check YES only if demanded in complaint:

JURY DEMAND: ☒ YES ☐ NO

VIII. This case

- ☐ is not a refiling of a previously dismissed action.
☒ is a refiling of case number 01 C 1585, previously dismissed by Judge Alesia.

1-2

DATE
4/5/02

SIGNATURE OF ATTORNEY OF RECORD

UNITED STATES DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

JUDGE GOTTSCHALL

In the Matter of

MAGISTRATE JUDGE MASON
SHAWN BROSSAU V. TRUMP CASINO CORPORATION and HORNBLLOWER MARINE SERVICES, INC.

Case Number:

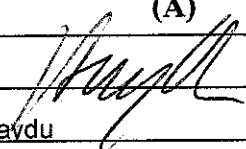
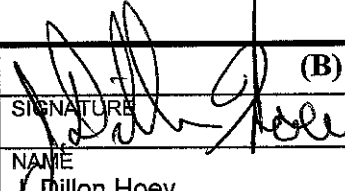
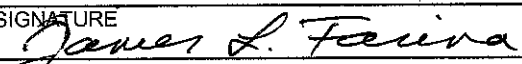
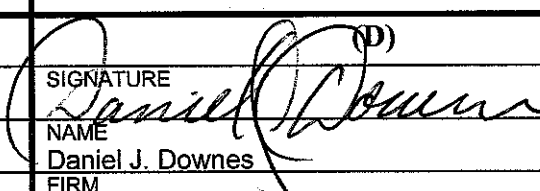
020 241

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Shawn Brosseau, Plaintiff

DOCKETED

APR 8 2002

(A)	(B)
SIGNATURE 	SIGNATURE 
NAME Richard A. Haydu	NAME J. Dillon Hoey
FIRM Hoey, Farina & Downes	FIRM Same as (A)
STREET ADDRESS 542 S. Dearborn Street, Suite 200	STREET ADDRESS
CITY/STATE/ZIP Chicago, IL 60605	CITY/STATE/ZIP
TELEPHONE NUMBER (312) 939-1212	TELEPHONE NUMBER
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 006180271	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 01233491
MEMBER OF TRIAL BAR? YES X NO	MEMBER OF TRIAL BAR? YES X NO
TRIAL ATTORNEY? YES X NO	TRIAL ATTORNEY? YES NO X
	DESIGNATED AS LOCAL COUNSEL? YES NO
(C)	(D)
SIGNATURE 	SIGNATURE 
NAME James L. Farina	NAME Daniel J. Downes
FIRM Same as (A)	FIRM Same as (A)
STREET ADDRESS	STREET ADDRESS
CITY/STATE/ZIP	CITY/STATE/ZIP
TELEPHONE NUMBER	TELEPHONE NUMBER
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 03124297	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 00668923
MEMBER OF TRIAL BAR? YES X NO	MEMBER OF TRIAL BAR? YES X NO
TRIAL ATTORNEY? YES NO X	TRIAL ATTORNEY? YES NO X
DESIGNATED AS LOCAL COUNSEL? YES NO	DESIGNATED AS LOCAL COUNSEL? YES NO

PLEASE COMPLETE IN ACCORDANCE WITH INSTRUCTIONS ON REVERSE.

1-3

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

In the Matter of

SHAWN BROSSAU V. TRUMP CASINO CORPORATION and HORNBLOWER MARINE SERVICES, INC.


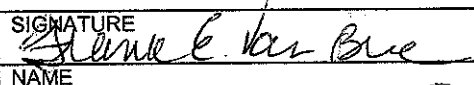
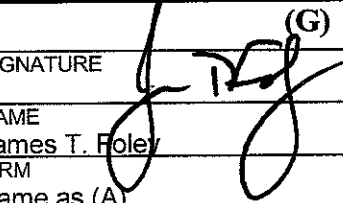
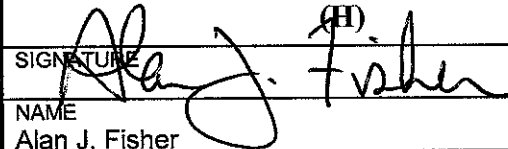
Case Number:

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Shawn Brosseau, Plaintiff

DOCKETED

APR - 8 2002

(E)	(F)
SIGNATURE 	SIGNATURE 
NAME Robert J. Drummond	NAME Frank E. Van Bree
FIRM Same as (A)	FIRM Same as (A)
STREET ADDRESS	STREET ADDRESS
CITY/STATE/ZIP	CITY/STATE/ZIP
TELEPHONE NUMBER	TELEPHONE NUMBER
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 03124251	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 02884542
MEMBER OF TRIAL BAR? YES NO X	MEMBER OF TRIAL BAR? YES X NO
TRIAL ATTORNEY? YES NO X	TRIAL ATTORNEY? YES NO X
	DESIGNATED AS LOCAL COUNSEL? YES NO
SIGNATURE 	SIGNATURE 
NAME James T. Foley	NAME Alan J. Fisher
FIRM Same as (A)	FIRM Same as (A)
STREET ADDRESS	STREET ADDRESS
CITY/STATE/ZIP	CITY/STATE/ZIP
TELEPHONE NUMBER	TELEPHONE NUMBER
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 06224939	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 06181578
MEMBER OF TRIAL BAR? YES X NO	MEMBER OF TRIAL BAR? YES NO
TRIAL ATTORNEY? YES NO X	TRIAL ATTORNEY? YES NO X
DESIGNATED AS LOCAL COUNSEL? YES NO	DESIGNATED AS LOCAL COUNSEL? YES NO

PLEASE COMPLETE IN ACCORDANCE WITH INSTRUCTIONS ON REVERSE.

1-3

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

In the Matter of

SHAWN BROSSAU V. TRUMP CASINO CORPORATION and HORNBLLOWER MARINE SERVICES, INC.


Case Number:

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Shawn Brosseau, Plaintiff

DOCKETED

APR - 8 2002

(I)	(J)
SIGNATURE 	SIGNATURE
NAME George T. Brugess	NAME
FIRM Same as (A)	FIRM
STREET ADDRESS	STREET ADDRESS
CITY/STATE/ZIP	CITY/STATE/ZIP
TELEPHONE NUMBER	TELEPHONE NUMBER
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 06180097	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)
MEMBER OF TRIAL BAR? YES NO X	MEMBER OF TRIAL BAR? YES NO
TRIAL ATTORNEY? YES NO X	TRIAL ATTORNEY? YES NO
	DESIGNATED AS LOCAL COUNSEL? YES NO
(K)	(L)
SIGNATURE	SIGNATURE
NAME	NAME
FIRM	FIRM
STREET ADDRESS	STREET ADDRESS
CITY/STATE/ZIP	CITY/STATE/ZIP
TELEPHONE NUMBER	TELEPHONE NUMBER
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)
MEMBER OF TRIAL BAR? YES NO	MEMBER OF TRIAL BAR? YES NO
TRIAL ATTORNEY? YES NO	TRIAL ATTORNEY? YES NO
DESIGNATED AS LOCAL COUNSEL? YES NO	DESIGNATED AS LOCAL COUNSEL? YES NO

PLEASE COMPLETE IN ACCORDANCE WITH INSTRUCTIONS ON REVERSE.

1-3